

[illegible]

Defendant, Love's Travel Stops & Country Stores ("Love's"), gives notice under 28 U.S.C §1441 of the removal of this action from the Circuit Court for Jefferson County Tennessee to the United States District Court for the Eastern District of Tennessee. In support of this Notice, the removing defendant would show the following:

2. The Plaintiff, as set forth in his Complaint, is an adult resident of Belleville, New Jersey. The Defendant, Love's Travel Stops & Country Stores, Inc., is an Oklahoma corporation with its principal place of business located at 10601 N. Pennsylvania Avenue, Oklahoma City, Oklahoma 73120. Jurisdiction is conferred under 28 U.S.C. 1332 relating to diversity of

citizenship of the parties. The parties are citizens of different states. The plaintiff seeks judgment in an amount in excess of \$25,000.00 in compensatory damages which appears to seek an amount in excess of the federal jurisdiction requisite amount. No further proceedings other than the filing of the Complaint have been had in the Circuit Court.

3. This Court has original jurisdiction over the above-styled action, diversity of citizenship exists between the parties and the amount in controversy exceeds the sum of \$75,000 exclusive of interest and costs. Therefore, the removal is proper pursuant to 28 U.S.C. 1441(a).

WHEREFORE, Love's gives Notice of the removal of this action pending in the Circuit Court of Jefferson County, Tennessee to the United States District Court for the Eastern District of Tennessee, Knoxville Division, and requests that the proceedings be held thereon.

Respectfully Submitted,

TAYLOR, FIGUE, MARCHETTI & BLAIR, PLLC

/s/Keith W. Blair

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CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2020, a copy of the foregoing Defendant's Notice of Removal was filed electronically. Notice of this filing will be sent to all registered parties by operation of the court's electronic filing system. Parties may access this filing through the court's system.

Kevin Poe
Jefferson County Circuit Court Clerk
765 Justice Center Drive, P.O. Box 671
Dandridge, TN 37725-0671

on this 3rd day of November, 2020.

/s/Keith W. Blair